

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Baldino's Lock & Key Service, Inc.

Plaintiff

Case No.: 1:14-CV-636-CMH-TCB

vs.

Google Inc., *et al.*,

Defendants

**MOTION TO AMEND**

Plaintiff Baldino hereby moves the Court to accept its First Amended Complaint. This amendment is made under Federal Rule 15.

No Defendant to date has answered. The amendment will in no way delay the litigation.

Plaintiff hereby respectfully asks the Court grant this motion to amend the Complaint. The new Complaint is attached. Plaintiff will provide each Defendant with a mark-up copy showing what has been added and what has been deleted.

Respectfully submitted,

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Dated and filed: August 15, 2014

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing *Motion to Amend and First Amended Complaint For Damages, Declaratory Judgment, And Permanent Injunction – Federal Law Violations Including Racketeer Influenced And Corrupt Organization Act, And Lanham Act Violations* with Exhibits was e-filed and electronically served, this 15th day of August, 2014 to the following:

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